



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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June 1, 2023

BY ECF

Honorable Jennifer L. Rochon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Chislett v. New York City Department of Education, et al.
21 Civ. 9650 (JLR) (SN)

Your Honor:

I am an attorney in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants New York City Department of Education (“DOE”) and Richard Carranza in the above-referenced matter. Defendants respectfully request an extension of time from June 9, 2023 until June 16, 2023 to file their motion for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure. Plaintiff’s counsel, Davida S. Perry, Esq., consents to this request.

By way of background, on April 27, 2023, the Court set a deadline of June 9, 2023 for Defendants to file their anticipated summary judgment. (See ECF No. 36.) As mentioned during the pre-motion conference on April 26, 2023, the undersigned had many other professional obligations through May 2023. These other obligations included engaging in motion practice on three (3) other matters and completing four (4) depositions on Bellis v. DOE, No. 21cv3282 (JMF), a similar matter also involving counsel for Plaintiff.

Additionally, the undersigned recently submitted his notice of resignation and will be leaving the New York City Law Department later this month. Thus, the undersigned is also in the process of reassigning all of his cases. As such, additional time is needed for the undersigned to prepare and file Defendants’ summary judgment motion.

Accordingly, Defendants respectfully request that the Court endorse the following proposed briefing schedule:

Defendants' Moving Papers	June 16, 2023
Plaintiff's Opposition Papers	July 28, 2023
Defendants' Reply Papers	August 11, 2023

Please note that the additional time for Plaintiff's response is being proposed because Plaintiff's counsel, Davida S. Perry, is out of the country from July 10th through July 24th. Thank you for your consideration of this request.

Respectfully submitted,

Bilal Haider /s

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cc: **VIA ECF**
Counsel of Record

The request is GRANTED. Defendants shall move for summary judgment by **June 16, 2023**. Plaintiff shall file its opposition papers by **July 28, 2023**. Defendants shall file their reply papers by **August 11, 2023**.

Dated: June 2, 2023
New York, New York

SO ORDERED.

Jennifer Rochon
JENNIFER L. ROCHON
United States District Judge